C. Remarks

In the office action, claims 1-9 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,303,151 (Neumann), and claims 10-19 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Neumann. Applicant respectfully traverses the rejections as follows.

1. § 103(a) Rejections

a. Claims 1-5

Applicant has amended claim 1 to recite a computer-assisted method of assisting a human language translator that includes:

> highlighting a first unit of source text to be translated into a target language based upon a first value of a source-unit start variable and a first value of a source-unit end variable;
>
> allowing insertion of translated text following the highlighted first unit of source text, wherein the inserted translated text is manually translated into the target language by the human language translator from the highlighted first unit of source text;
>
> performing a comparative statistical analysis between the highlighted first unit of source text and the inserted translated text; and
>
> removing the highlighted first unit of source text after insertion of the translated text.

Applicant submits that support for this amendment may be found throughout the specification and figures as filed.

Applicant submits that a *prima facie* case of obviousness under 35 U.S.C. § 103(a) requires that the cited references, alone or in combination, must teach or

suggest every element of the claim. *See* MPEP § 2142. Applicant submits that the

cited reference is not sufficient to establish a *prima facie* case of obviousness with

respect to claim 1 because it fails to teach or suggest every element thereof.

More specifically, Applicant submits that Neumann fails to teach or suggest, among

other things, a computer-assisted method of assisting a human language translator that

includes at least the steps of:

> highlighting a first unit of source text to be translated
> into a target language based upon a first value of a source-
> unit start variable and a first value of a source-unit end
> variable;

> allowing insertion of translated text following the
> highlighted first unit of source text, wherein the inserted
> translated text is manually translated into the target
> language by the human language translator from the
> highlighted first unit of source text;

and

> performing a comparative statistical analysis between
> the highlighted first unit of source text and the inserted
> translated text.

First, insofar as the Examiner may contend that the step of underlining source

terms taught by Neumann at column 4, lines 33-37 is equivalent to the step of

"highlighting a first unit of source text" as recited in claim 1, Applicant submits that

Neumann fails to teach or suggest the step of underlining or highlighting "based upon a

first value of a source-unit start variable and a first value of a source-unit end variable,"

as further recited in claim 1. Rather, Neumann discloses in the above-cited passage

that the step of underlining a source term is performed <u>based upon a match of the</u>

<u>source term to a source term contained within a product glossary</u>. Accordingly,

Applicant submits that Neumann fails to teach or suggest "highlighting a first unit of

source text to be translated into a target language based upon a first value of a source-unit start variable and a first value of a source-unit end variable," as recited in claim 1.

Second, insofar as the Examiner may contend that Figure 14B, element 1404 of Neumann teaches the step of "allowing insertion of translated text following the highlighted first unit of source text" recited in claim 1, Applicant submits that Neumann fails to teach or suggest that the inserted text "is manually translated into the target language by the human language translator from the highlighted first unit of source text," as further recited in claim 1. Rather, Neumann discloses that the underlined source terms (i.e., the equivalent of the claimed highlighted source text, according to the Examiner) are translated by invoking a "target term command" that causes a translation inserter 236 to retrieve a target term 256 from an index file 256. See, e.g., column 8, lines 3-33. Thus, whereas the inserted translated text of claim 1 is "manually translated into the target language by the human language translator," Neumann discloses that the underlined source terms are automatically translated using machine translation techniques. Accordingly, Applicant submits that Neumann fails to teach or suggest "allowing insertion of translated text following the highlighted first unit of source text, wherein the inserted translated text is manually translated into the target language by the human language translator from the highlighted first unit of source text," as recited in claim 1.

Third, Applicant submits that Neumann fails to teach or suggest "performing a comparative statistical analysis between the highlighted first unit of source text and the inserted translated text," as recited in claim 1. Rather, Neumann merely discloses that after a portion of a source language document has been translated, the user may simply

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delete the translated portion of the source language document. See, e.g., column 16, lines 27-30.

Applicant has amended claims 2 and 4 to conform to the amendment of their base claim (claim 1) and/or to clarify aspects of the claimed subject matter. Applicant submits that support for these amendments may be found throughout the specification and figures as filed.

For at least the above reasons, Applicant submits that claim 1, as well as claims 2-5 depending therefrom, are nonobvious over Neumann. *See* MPEP § 2143.03 (stating that if an independent claim is nonobvious under § 103(a), then any claim depending therefrom is nonobvious). Accordingly, Applicant respectfully requests that the § 103(a) rejections of claims 1-5 be withdrawn.

b. Claims 6 and 7

Claim 6 is directed to an apparatus for assisting a human language translator and has been amended in a manner similar to claim 1 discussed above. Applicant has also amended claim 7 to conform to the amendment of its base claim (claim 6) and to clarify aspects of the claimed subject matter. Applicant submits that support for these amendments may be found throughout the specification and figures as filed. Therefore, for reasons analogous to those presented above with respect to claim 1, Applicant submits that that claim 6, as well as claim 7 depending therefrom, is nonobvious over Neumann. Accordingly, Applicant respectfully requests that the § 103(a) rejections of claims 6 and 7 be withdrawn.

c. Claims 8 and 9

Claim 8 is directed to a computer-readable medium and has been amended in a manner similar to claim 1 discussed above. Applicant has also amended claim 9 to conform to the amendment of its base claim (claim 8) and to clarify aspects of the claimed subject matter. Applicant submits that support for these amendments may be found throughout the specification and figures as filed. Therefore, for reasons analogous to those presented above with respect to claim 1, Applicant submits that that claim 8, as well as claim 9 depending therefrom, is nonobvious over Neumann. Accordingly, Applicant respectfully requests that the § 103(a) rejections of claims 8 and 9 be withdrawn.

2. § 102(b) Rejections

a. Claims 10-18

Applicant has amended claim 10 to recite an apparatus for assisting a human language translator that includes:

> a source text unit definition module for defining a unit of source text to be translated into a target language based upon a value of a source-unit start variable and a value of a source-unit end variable;

> a target text unit definition module for defining a unit of target text and for performing a comparative statistical analysis between the defined unit of source text and the defined unit of target text, wherein the defined unit of target text is defined at least in part based upon a translated text that is manually translated into the target language by the human language translator from the defined unit of source text;

an entry preparation module for preparing for an entry
of the unit of target text by the human language translator;
and

a source text unit delete module for deleting the unit
of source text.

Applicant has also amended claim 16 to correct a minor typographical error. Applicant

submits that support for these amendments may be found throughout the specification

and figures as filed.

Applicant submits that a claim rejection based on anticipation under

§ 102 requires that a single prior art reference disclose each and every element of the

claimed invention. *See* MPEP § 2131 (stating that a claim is anticipated only if each

and every element as set forth in the claim is disclosed in a single prior art reference).

For reasons analogous to those presented above with respect to claim 1, Applicant

submits that Neumann fails to anticipate claim 10 because it fails to disclose at least the

feature of:

a target text unit definition module for defining a unit
of target text and for performing a comparative statistical
analysis between the defined unit of source text and the
defined unit of target text, wherein the defined unit of target
text is defined at least in part based upon a translated text
that is manually translated into the target language by the
human language translator from the defined unit of source
text,

as recited therein. Applicant submits that claims 11-18 depending from claim 10 are not

anticipated or rendered obvious in view of Neumann by virtue of their dependence from

claim 10, and by their own merits. Applicant therefore respectfully requests that the

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§ 102(b) rejections of claims 10-18 be withdrawn.

b. Claim 19

Claim 19 is directed to a translation system and has been amended in a manner similar to claim 10 discussed above. Applicant submits that support for this amendment may be found throughout the specification and figures as filed. Therefore, for reasons analogous to those presented above with respect to claim 10, Applicant submits that that claim 19 is not anticipated by Neumann. Accordingly, Applicant respectfully requests that the § 102(b) rejection of claim 19 be withdrawn.

Applicant is not otherwise conceding the correctness of the rejections with respect to any of the dependent claims discussed above and wishes to reserve the right to make additional arguments as may be necessary because additional features of the dependent claims further distinguish the claims from the cited references, taken alone or in combination. A detailed discussion of these differences is believed to be unnecessary at this time in view of the basic differences in the independent claims pointed out above.
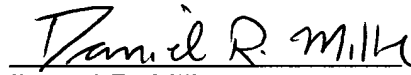
3. Corrected Drawing Sheets

Applicant submits herewith corrected drawing sheets complying with 37 C.F.R. 1.121(d) for Figures 4A, 4B, 5A, 5B, 6A-D, 7A, 7B, 9A-E, 12A-C, 15A-C, and 19 in which handwritten elements and titles have been replaced with typewritten elements and titles.

D. Conclusion

Applicant respectfully requests a Notice of Allowance for the pending claims in the present application. If the Examiner is of the opinion that the present application is in condition for disposition other than allowance, the Examiner is respectfully requested to contact the undersigned at the telephone number listed below in order that the Examiner's concerns may be expeditiously addressed.

Respectfully submitted,

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